

**VERMONT SECRETARY OF STATE****Corporations Division**

MAILING ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

DELIVERY ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

PHONE: 802-828-2386

WEBSITE: www.sec.state.vt.us

02/11/2019

EQUIFAX INCORPORATED

1550 PEACHTREE ST., NW

ATLANTA GA 30309

RE: Acceptance of Data Broker Registration **THIS IS NOT A BILL**

This letter is to confirm the acceptance of the following Data Broker:

Type of Request:

DATA BROKER REGISTRATION

Work Order Number	:	2013572379	Filing Number	:	0002513487
Date Accepted	:	2/11/2019	Payment Received	:	\$100.00
Work Order Payment Total	:	\$100.00	Client ID	:	000013251

The Vermont Secretary of State

Division of Corporations

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1. Acknowledgement Information.

- a. Name: Ann Allinson Equifax Inc.
- b. Acknowledgement Address: 1550 Peachtree Street, N.W., Atlanta, GA, 30309, USA
- c. Email Address: _____
- d. Phone No: _____

2. Data Broker Information.

- a. Name: EQUIFAX INFORMATION SERVICES LLC
- b. Primary Physical Address: 1550 Peachtree Street, N.W., Atlanta, GA, 30309, USA
- c. Primary Email Address: vtinquiries@equifax.com
- d. Primary Internet Address (URL): www.equifax.com

3. Does the data broker permit a consumer to opt out of the data broker's collection of brokered personal information, opt out of its databases or opt out of certain sales of data? Yes No

If so:

- a. What was the method for requesting an opt-out?

See attachment.

- b. If the opt-out applied to only certain activities or sales, which ones?

See attachment.

- c. Does the data broker permit a consumer to authorize a third party to perform the opt-out on the consumer's behalf?

See attachment.

4. Statement specifying the data collection, databases or sales activities from which a consumer may not have opted out during the prior year:

See attachment.

5. Statement regarding whether the data broker implemented a purchaser credentialing process during the prior year:

See attachment.

6. The number of security breaches that the data broker experienced during the prior year: 0.

Total number of consumers affected by the breaches: 0.



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- 7. Where the data broker has actual knowledge that it possesses the brokered personal information of minors, provide a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors:**

See attachment.

- 8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices during the prior year:**

none

9. Certification of Annual Registration.

I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate.

Adele Braxton-Fields

PRINTED NAME

Adele Braxton-Fields

SIGNATURE

02/11/2019

DATE



Vermont Secretary of State
ANNUAL REGISTRATION OF DATA BROKERS

"Data broker" means a business, or unit or units of a business, separately or together, that knowingly collects and sells or licenses to third parties the brokered personal information of a consumer with whom the business does not have a direct relationship. 9 V.S.A. § 2430(4).

Registration ID: _____

VTSDS-CORPS. DIV.
JAN 31 2019 PM12:41

1. Return Acknowledgement to: Required - Name and Address

Ann Allinson
Equifax Inc.
1550 Peachtree Street, N.W.
Atlanta, GA 30309

Processed by: _____
FOR OFFICE USE ONLY

This registration is required annually between January 1 and January 31 following a calendar year in which a person meets the definition of a data broker as provided above. 9 V.S.A. § 2446.

Each response should be answered with specificity. A reference to a company website, general policy or terms of service would not be an appropriate response. You may supplement your response with a reference to a specific page of a website, but this may not replace a specific response.

2. Data Broker¹ Information. Required.

- a. Name: Equifax Information Services LLC
- b. Primary Physical Address: 1550 Peachtree Street, N.W., Atlanta, GA 30309
- c. Primary Email Address: VTinquiries@equifax.com
- d. Primary Internet Address (URL): www.equifax.com

3. Does the data broker permit a consumer to opt out of the data broker's collection of brokered personal information,² opt out of its databases, or opt out of certain sales of data? Required.

Yes No

If so:

- a. What is the method for requesting an opt-out? Equifax Information Services LLC ("Equifax") provides consumer credit reports to its business customers who have a permissible purpose under the Fair Credit Reporting Act ("FCRA"). Equifax receives brokered personal information and account receivables information from a variety of data furnishers that provide information about the consumer's payment history with the data furnishers. Consumers may not opt out of the credit reporting system completely, but they do have the right to opt out of prescreening (as described below) and they have the right to place a security freeze on their credit report that will prevent access to their credit report except for the allowed exceptions under the FCRA.

Equifax provides information to certain customers, including credit card companies and lenders, so that these customers may offer pre-approved offers to consumers as permitted by the FCRA. If the consumer prefers not to receive such offers, they may visit www.optoutprescreen.com or call toll free 1-888-5-OPT OUT (or 1-888-567-8688).

- b. If the opt-out applies to only certain activities or sales, which ones? Please see response to 3.a. above.

- c. Does the data broker permit a consumer to authorize a third party to perform the opt-out on the consumer's behalf? Generally, Equifax permits a third party to request the opt-out or security freeze on behalf of the consumer if the third party provides a valid power of attorney or other appropriate documentation evidencing his or her authority to act on behalf of the consumer.

4. Provide a statement specifying the data collection, databases, or sales activities from which a consumer may not opt out: Required.

Please see responses to Item 3 above. Under the FCRA, the consumer does not have the ability to opt-out of the credit reporting process. Any financial institution that the consumer does business with is likely to report its payment experience with the consumer to one or more of the three national consumer reporting agencies such as Equifax. Equifax provides consumer credit report information from its credit reporting database to its customers as allowed by the FCRA.

Equifax also has a database containing various elements of brokered personal information, such as credit header data and similar brokered personal information obtained in connection with its credit reporting business, which it receives from its data furnishers, end-users, and third party data providers. This information may be sold to customers and other resellers who certify that it will only be used for a purpose that is consistent with the requirements of the Gramm-Leach-Bliley Act ("GLB"), such as fraud prevention.

Other relevant databases maintained by Equifax are the ID Mart, Phone Number Data Mart and the DOB Data Mart that contain brokered personal information. Information from these databases is only provided to business customers who certify that they will only use the information as permitted by GLB.

Equifax is also an authorized source for lenders to check the Defense Manpower Data Center (DMDC) database to verify the status of a consumer as a covered borrower in accordance with the Military Lending Act.



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ANNUAL REGISTRATION OF DATA BROKERS

VT SOS-CORPS. DIV.
JAN 31 2019 PM12:41

<p>5. Provide a statement regarding whether the data broker implements a purchaser credentialing process: Required.</p> <p>Equifax has robust credentialing requirements for new customers. Although requirements may vary based upon the type of business, the general procedure is that upon submission of the completed application for service, a prospective customer's business is verified by confirming their business license or other professional license, validating their Federal Employer Identification Number, obtaining a business credit report, and by reviewing the business's website (if available) to confirm the nature of their business activity and to confirm that the customer has a valid permissible purpose in accordance with applicable law. The customer's physical location may also be verified through an on-site inspection or other means as appropriate.</p>						
<p>6. a. The number of security breaches³ that the data broker¹ has experienced during the prior year: Required. <u>none</u></p> <p>b. If known, the total number of Vermont residents affected by the breaches: <u>none</u></p>						
<p>7. Where the data broker has actual knowledge that it possesses the brokered personal information² of minors, a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors: Required.</p> <p>Equifax may receive information from its data furnishers or end-users on minors. Equifax takes steps to remove any information on consumers under the age of 21, or consumers for whom no age or date of birth is available, from the Equifax Credit Marketing Database, so that no minor consumer's credit information is accessed for purposes of prescreening. Equifax does not knowingly provide credit reports on minors under the age of 16 to its customers, but if the minor's age or date of birth are not provided, it is possible that a minor's credit report could be issued. Equifax does allow the parent or guardian of a minor under the age of 16 to place a security freeze on the minor's credit file, subject to the proof of identity and proof of authority requirements of the FCRA.</p>						
<p>8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices: Optional.</p>						
<p>9. Certification of Annual Registration: Required.</p> <p>I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate; and that this document is provided with a Check or Money Order, payable to "VT SOS" in the amount of <u>\$100.00</u>.</p> <table><tr><td><u>Adele Braxton - Fields</u></td><td><u>Adele Braxton-Fields</u></td><td><u>1-30-19</u></td></tr><tr><td>Printed Name</td><td>Signature</td><td>Date</td></tr></table>	<u>Adele Braxton - Fields</u>	<u>Adele Braxton-Fields</u>	<u>1-30-19</u>	Printed Name	Signature	Date
<u>Adele Braxton - Fields</u>	<u>Adele Braxton-Fields</u>	<u>1-30-19</u>				
Printed Name	Signature	Date				

¹ "Data broker" means a business, or unit or units of a business, separately or together, that knowingly collects and sells or licenses to third parties the brokered personal information of a consumer with whom the business does not have a direct relationship. Examples of a direct relationship with a business include if the consumer is a past or present customer, client, subscriber, user, or registered user of the business's goods or services; employee, contractor, or agent of the business; investor in the business; or donor to the business. The following activities conducted by a business, and the collection and sale or licensing of brokered personal information incidental to conducting these activities, do not qualify the business as a data broker: developing or maintaining third-party e-commerce or application platforms; providing 411 directory assistance or directory information services, including name, address, and telephone number, on behalf of or as a function of a telecommunications carrier; providing publicly available information related to a consumer's business or profession; or providing publicly available information via real-time or near-real-time alert services for health or safety purposes. The phrase "sells or licenses" does not include: a one-time or occasional sale of assets of a business as part of a transfer of control of those assets that is not part of the ordinary conduct of the business; or a sale or license of data that is merely incidental to the business. 9 V.S.A. § 2430(4).

² "Brokered personal information" means one or more of the following computerized data elements about a consumer, if categorized or organized for dissemination to third parties: name; address; date of birth; place of birth; mother's maiden name; unique biometric data generated from measurements or technical analysis of human body characteristics used by the owner or licensee of the data to identify or authenticate the consumer, such as a fingerprint, retina or iris image, or other unique physical representation or digital representation of biometric data; name or address of a member of the consumer's immediate family or household; Social Security number or other government-issued identification number; or other information that, alone or in combination with the other information sold or licensed, would allow a reasonable person to identify the consumer with reasonable certainty. "Brokered personal information" does not include publicly available information to the extent that it is related to a consumer's business or profession. 9 V.S.A. § 2430(1).

³ "Security breach" means unauthorized acquisition of, electronic data or a reasonable belief of an unauthorized acquisition of, electronic data that compromises the security, confidentiality or integrity of a consumer's personally identifiable information maintained by a data collector. "Security breach" does not include good faith but unauthorized acquisition of personally identifiable information by an employee or agent of the data collector for a legitimate purpose of the data collector; provided that the personally identifiable information is not used for a purpose unrelated to the data collector's business or subject to further unauthorized disclosure. In determining whether personally identifiable information has been acquired or is reasonably believed to have been acquired by a person without valid authorization, a data collector may consider the following factors, among others: indications that the information is in the physical possession and control of a person without valid authorization, such as a lost or stolen computer or other device containing information; indications that the information has been downloaded or copied; indications that the information was used by an unauthorized person, such as fraudulent accounts opened or instances of identity theft reported; or that the information has been made public. 9 V.S.A. § 2430(12).